

## **REMARKS**

With the foregoing amendment claims 1, 2, 4-17, and 21-28 are pending in the application. Claims 1, 9, 17, and 24 are independent. No new matter has been added by the amendments. Applicants respectfully request reconsideration of the present application.

### **Rejection of Claims 1, 2, and 4-8**

Independent claim 1 stands rejected under 35 U.S.C. 103 as being unpatentable over Oie (US 6,188,431) in view of Niikawa (US 6,947,075).

To establish a prima facie case of obviousness the cited art “must teach or suggest all of the claim limitations.” M.P.E.P. § 2143 (emphasis added). Claim 1 is patentable over the cited art because the cited art, whether considered alone or in combination, does not teach or suggest all of the features of claim 1. For example, at the least, neither Oie nor Niikawa, considered alone or in combination, teach or suggest, “simultaneously display[ing] on a display screen [of a second camera device] the captured image transmitted from the first device and a pointer for pointing to or indicating a portion of said captured image, wherein the first device controls movement of the pointer ...,” as is required by claim 1.

Applicant agrees with the Office that Oie does not teach or suggest this feature. But, Applicant respectfully disagrees with the Office’s contention that Niikawa teaches or suggests this feature.

As is readily apparent from the figures of Niikawa, Niikawa discloses nothing more than enabling a user to use a camera to control a pointer displayed by a computer to which the camera is connected, wherein the pointer displayed by the computer overlays a graphical user interface of the computer’s operating system. This feature of Niikawa allows the user to drag icons “as if the user operates the PC 1000 by using the mouse thereof.” *Col. 8, lines 14-17*. Nowhere does Niikawa teach or suggest that the pointer displayed by the computer is displayed together with an image that was captured by the camera. Accordingly, Niikawa does not make up for the deficient teaching of Oie. In short, neither Oie nor Niikawa teach or suggest “simultaneously display[ing] on a display screen [of a second camera device] the captured image transmitted from the first device and a pointer for pointing to or indicating a

portion of said captured image, wherein the first device controls movement of the pointer ...,” as is required by claim 1. For the forgoing reason, Applicant respectfully requests that the rejection of claim 1 (and the claims that depend therefrom) be withdrawn.

Moreover, not only must the references teach or suggest all of the features, but there must be some suggestion or motivation to combine the references. In this case, there is no motivation or suggestion to combine Oie with Niikawa. Oie is directed to a method for communication between two cameras. In contrast, Niikawa is directed to a camera that can connect to a network comprising a plurality of computers. Connecting a camera to a network is completely different than connecting a camera to another camera. Because Niikawa discloses only connecting a camera to a network, and not to another camera, Niikawa does not provide any suggestion to modify the system of Oie. For this additional reason, the rejection of claim 1 should be withdrawn.

#### **Rejection of Claims 9-16**

Independent claim 9 stands rejected under 35 U.S.C. 103 as being unpatentable over Oie (US 6,188,431) in view of Niikawa (US 6,947,075) and Watanabe (US 20020196197).

The above remarks for claim 1 apply to claim 9 because claim 9 requires “said data items include data for controlling the movement of a pointer overlaying an image displayed on a display screen of a second digital image capturing device, wherein said displayed image was captured by the first digital image capturing device and subsequently transferred to the second device.” As discussed above with respect to claim 1, neither Oie nor Niikawa disclose two cameras connected by a link cable, wherein one of the cameras controls a pointer displayed by the other camera. Watanabe does not disclose this feature either. Thus, claim 9 and the claims that depend therefrom are patentable over the art of record.

#### **Rejection of Claims 17 and 21-23**

Independent claim 17 stands rejected under 35 U.S.C. 103 as being unpatentable over Oie (US 6,188,431) in view of Niikawa (US 6,947,075), Watanabe (US 20020196197), and Kiyokawa (US 6,204,877).

Claim 17 is patentable over the cited art because the cited art, whether considered alone or in combination, does not teach or suggest all of the features of claim 17. For example, at the least, none of the art teach or suggest, “while transmitting the real time view [to the second device], also transmitting to the second device ... a pointer overlay, wherein pointer overlay and the real time view of the image are displayed simultaneously on a display screen of the second device such that the pointer overlay overlays the real time view of the image,” as is required by claim 17. Because not one of the references teach or suggest this step, the references when combined do not teach or suggest all of the features of claim 17. Thus, the rejection of claim 17 and the claims that depend therefrom should be withdrawn.

#### **Rejection of Claims 24-28**


Independent claim 24 stands rejected under 35 U.S.C. 103 as being unpatentable over Oie (US 6,188,431) in view of Niikawa (US 6,947,075) and Watanabe (US 20020196197).

The above remarks for claims 1 and 9 apply to claim 24 because claim 24 requires “transmitting said image to said connected slave digital image capturing device if said first digital image capturing device is a master, wherein the slave device displays the image on a display screen and displays a pointer on top of the image, and enabling [a] user to move the pointer within the display screen by manipulating a control on the first device.” As discussed above with respect to claims 1 and 9, neither Oie, Niikawa nor Watanabe teach or suggest one camera that displays a pointer on top of an image captured by another camera, wherein the pointer is controlled by the other camera. Thus, claim 24 is patentable over the art of record.

#### **CONCLUSION**

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections, and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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